## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA, Plaintiff,

v.

- [1] WANDA VÁZQUEZ GARCED,
- [2] JULIO M. HERRERA VELUTINI,
- [3] MARK T. ROSSINI, Defendants.

CRIMINAL NO. 22-342 (SCC)

[SELECTED PARTIES]

## JOINT REPORT AND MOTION FOR EXTENSION OF TIME

The United States of America and defendants [1] Wanda Vázquez-Garced, [2] Julio M. Herrera Velutini, and [3] Mark T. Rossini jointly file this motion in compliance with the Court Order of April 22, 2025, and requesting the following:

- 1. The United States Department of Justice has finalized its review of certain matters related to this case, as referenced at ECF No. 855.
- 2. The parties have agreed to enter good-faith discussions to resolve this case in the interests of justice. To that end, an in-person meeting has been scheduled for next week in Washington D.C., to include the participation of the United States Attorney and department leadership. Any such resolution would avoid the parties and, importantly, the Court, having to expend considerable time and resources filing and adjudicating numerous motions, engaging in pre-trial activities, and conducting a lengthy trial.
- 3. Therefore, to allow the parties sufficient time to comprehensively explore a final resolution which will conserve substantial judicial and private resources, the parties request a thirtyday extension of all deadlines, including the trial date.

WHEREFORE, the parties respectfully requests that the Court note the above and grant the request to extend all deadlines for thirty days.

Respectfully submitted on this 22nd day of May, 2025 in San Juan, Puerto Rico.

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system.

> W. STEPHEN MULDROW United States Attorney

\_s/ Seth A. Erbe\_ SETH A. ERBE USDC-PR No. 220807 **Assistant United States Attorney** United States Attorney's Office Torre Chardón, Suite 1201 350 Carlos Chardón Ave. San Juan, PR 00918 Tel. (787) 766-5656 seth.a.erbe@usdoj.gov